C.2 Compliance/
Enforcement

06 JUN 1989

5HR-12

Mr. Don Samdahl
Engineer, Industrial Hygiene & Safety
General Electric Company
1601 G.E. Road
P.O. Box 2913
Bloomington, Illinois 61704

Re: General Electric Company
ILD 005 453 691

Dear Mr. Samdahl:

On March 7, 1989, Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The Land Disposal Restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

Subsequently, a Notice of Violation letter was sent to General Electric, for a violation of the land disposal regulations. After further review of the inspection report, it was determined that your facility was in compliance with these requirements. Therefore, please disregard our letter of May 18, 1989, concerning this matter.

Please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922, if you have any further questions.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Harry Chappel, IEPA
Glen Savage, IEPA

5HR-12:B. RUSSELL:or:05/25/89:3-7925:DISK #2:PC FILENAME:Donsamda

O.K. 6/5/89

RCRA ENFORCEMENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	6/5/89	6-6-89	

18 MAY 1989

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Samdahl
Engineer, Industrial Hygiene & Safety
General Electric Company
1601 G.E. Road
P.O. Box 2913
Bloomington, Illinois 61704

Re: Notice of Violation
General Electric Company
ILD 005 453 691

Dear Mr. Samdahl:

On March 7, 1989, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The Land Disposal Restrictions for F001-F005 spent solvents became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 268, and 270-271). Additionally, the land disposal restrictions for First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

> Failure to correctly determine the appropriate treatment standards of the waste for First Third waste, as required by section 268.40.

A copy of the inspection report is enclosed for your records. please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA
Glen Savage, IEPA

5HR-12:B. RUSSELL:04:05/11/89:3-7925:DISK #1:PC FILENAME:SAMDAHL

O.R 5/11/89

RCRA ENFORCE-MENT	REB STAFF	RES SECTION CHIEF	REB CHIEF
INIT. DATE	BR 5/17/89	P.E.D. 5-17-89	

P 155 069 740

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Barbara Russell (5H12-12)

Sent to Don Samdahl	
Street and No. 1601 G.E. Road, P.O. Box 2913	
P.O., State and ZIP Code Bloomington, IL 61704	
Postage	$ 2.05
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 3.80
Postmark or Date	

USPO STA. LOOP CHICAGO, IL MAY 1989

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.
1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery
(Extra charge) *(Extra charge)*

3. Article Addressed to:
Don Samdahl
Engineer, Industrial Hygiene & Safety
General Electric Company
1601 G.E. Road
P.O. Box 2913
Bloomington, IL 61704

4. Article Number
P 155 069 740

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X Tim Jeffers

7. Date of Delivery
5-22-89

8. Addressee's Address *(ONLY if requested and fee paid)*

BLOOMINGTON MAY 22 1989 USPO

PS Form **3811**, Mar. 1987 ★ U.S.G.P.O. 1987-178-268 **DOMESTIC RETURN RECEIPT**

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

Barbara Russell (5HR-12)
U.S. Environmental Protection Agency
230 S. Dearborn, Chicago, IL 60604

FOS

RCRA LAND DISPCSAL RESTRICTION INSPECTION

Facility: General Electric Company

U.S. EPA I.D. No.: ILD005453691 / Stated 113020006

Street: 1601 G.E. Road, P.O. Box 2913

City: Bloomington **State:** Illinois **Zip Code:** 61704

Telephone: 309/662-4311

Operator: General Electric Company

Street: 1601 G.E. Road, P.O. Box 2913

City: Bloomington **State:** Illinois **Zip Code:** 61704

Telephone: 309/662-4311

Owner: General Electric Company

Street: 3135 Easton Turnpike

City: Fairfield **State:** CT **Zip Code:** 06431

Telephone: 203/373-2211

Inspection Date: 03/07/89 **Time:** 2:21P - 4:48P **Weather Conditions:** ~32° F, clear

	Name	Affiliation	Telephone
Inspectors:	Richard Johnson	IEPA	217/786-6892

Facility Representatives: Don Samdahl (Engineer, Industrial Hygiene & Safety)

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator		X		X
Transporter				
Treater		(*) X		(*) X
Storer		X		
Disposer				

RECEIVED
APR - 7 1989
EPA-DLPC

(*) Exempt treatment

Revised 9-26-88

INSPECTION SUMMARY

A Resource Conservation & Recovery Act (RCRA) inspection was conducted at the G.E. plant in Bloomington, Illinois on 3-3-89 and 3-7-89.

G.E. manufactures motor control equipment such as starters, reversers, relays, push bottom, switches, etc.

The facility both generates more than 1000 kilograms of hazardous waste per month and stores hazardous waste in containers. G.E. has interim status to store the containers.

Parts at the facility are given metal coatings by electroplating or passive plating. Wastewater generated from the on-site operations (including the plating) is treated by an on-site pre-treatment facility. The pre-treatment facility has a permit from IEPA's Division of Water Pollution Control to operate. A wastewater treatment (WWT) sludge is generated from the pre-treatment (F006).

A paint operation at the plant generates spent solvent and paint which include toluene, xylene, methy isobutly ketone and methyl ethyl ketone. The waste is considered listed waste F003 and F005 (and D001).

G.E. uses 1,1,1-trichloroethane and freon for parts cleaning. Hazardous wastes generated from the cleaning include F001 and F002.

Methylene chloride (F002) is used to clean paint hooks as well as clean resin application lines.

The wastewater treatment appears to be exempt pursuant to 265.01 (c)(2)(10). A distillation unit on a large vapor degreaser recycles 1,1,1-trichloroethane and is apparently exempt under 261.06 (c)(1).

Revised 9-26-88

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes**					
1.	F001	X	(*) X	X	___	___
2.	F002	X	___	X	___	___
3.	F003	X	___	X	___	___
4.	F004	___	___	___	___	___
5.	F005	X	___	X	___	___

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

(*) Exempt treatment

B. **California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	___	___	___	___	___
Cadmium	100 mg/L	___	___	___	___	___
Chromium VI	500 mg/L	___	___	___	___	___
Lead	500 mg/L	___	___	___	___	___
Mercury	20 mg/L	___	___	___	___	___
Nickel	134 mg/L	___	___	___	___	___
Selenium	100 mg/L	___	___	___	___	___
Thallium	130 mg/L	___	___	___	___	___

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

NA

	Gen.	Treat	Store	Disp.	Trans.
	____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

	____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

	____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. **First Third Wastes**

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	X	(*) X	X		
F007					
F008					
F009					
F019					
K001*					
K004*					
K008*					
K011					
K013					
K014					
K015*					
K016*					
K017					
K018*					
K019*					
K020*					
K021*					
K022*					
K024*					
K025*					
K030*					
K031					
K035					
K036*					
K037*					
K044*					
K045*					
K046*					

(*) Exempt treatment

	Gen.	Treat	Store	Disp.	APP Trans.
K047*					
K048*					
K049*					
K050*					
K051*					
K052*					
K060*					
K061*					
K062*					
K069*					
K071*					
K073*					
K083*					
K084					
K085					
K086*					
K087*					
K099*					
K100*					
K101*					
K102*					
K103*					
K104*					
K106*					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

APP

	Gen.	Treat	Store	Disp.	Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

	Gen.	Treat	Store	Disp.	APP Trans.
U010					
U012					
U016					
U018					
U019					
U022					
U029					
U031					
U036					
U037					
U041					
U043					
U044					
U046					
U050					
U051					
U053					
U061					
U063					
U064					
U066					
U067					
U074					
U077					
U078					
U086					
U089					
U103					
U105					
U108					
U115					
U122					
U124					

	Gen.	Treat	Store	Disp.	APP Trans.
U129					
U130					
U133					
U134					
U137					
U151					
U154					
U155					
U157					
U158					
U159					
U171					
U177					
U180					
U185					
U188					
U192					
U200					
U209					
U210					
U211					
U219					
U220					
U221					
U223					
U226					
U227					
U228					
U237					
U238					
U248					
U249					

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. **BDAT Treatability Group - Treatment Standards Identification**

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   _X_ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ____ Pharmaceutical wastewater containing spent methylene chloride
   _X_ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? N/A

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ____ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

X Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
X Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
Food		X

B. **Waste Analysis**

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

X Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. Analysis by recycling outside facility indicates percent solvent in waste, most are around 90%.

- TCLP

____ Yes X No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

X Yes ____ No ____ NA

If yes, specify the waste stream: F001, F002, F003 and F005

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes X No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

No changes were said to have occurred.

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846? N A

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ____ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

____ Liquid hazardous waste having a pH less than or equal to 2

____ Liquid hazardous waste containing metals

____ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

____ Yes ____ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

_____

NA

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

_____

_____

_____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes __X__ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes __X__ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

The facility has not apparently conducted a TCLP analysis on the Foolo

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate._____

_____

- TCLP

____ Yes ___X___ No ____ NA

- Total Constituent Analysis

___X___ Yes ____ No ____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

Included was the last analysis. Nickel is not included in the analysis

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ___X___ No ____ NA

d. How does the generator test the waste when a process or waste stream changes?

No changes have reportedly occurred.

C. <u>Management</u>

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

___X___ Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

___X___ Yes ____ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

___X___ Yes ____ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	X Yes	____ No
Applicable treatment standards	X Yes	____ No
Manifest number	X Yes	____ No
Waste analysis data, if available	____ Yes	____ No NA

Identify off-site treatment or storage facilities: Safety-Kleen (LWD (KY D088438817), HES (IND 093219012) and Envirite

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes ____X No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]? NA

____ Yes ____ No

f. Does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

_____

_____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

____ Yes ____X No ____ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

____ Yes ____ No NA

i. If yes, does the notification contain the following information? N/A

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ____ No

D. <u>Demonstration and Certification -- "Soft Hammer" Wastes</u>

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]? N/A

____ Yes ____ No

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment? N/A

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data, if available _____ Yes _____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u>
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265? The residuals are still regulated but the treatment is exempt.

_____ Yes _____ No

If yes, list types of waste treatment units and processes:
Distillation unit on a vapor degreaser (F001)
Waste water treatment in tanks (F006)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

N/A

A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:
_____ Interim status for storage
_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ___X___ Yes ____ No ____ NA

   o California List ____ Yes ____ No ___X___ NA

   o First Third ___X___ Yes ____ No ____ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ___X___ Yes ____ No

   a. What date was the waste analysis plan last revised? See waste disposition form attached

   b. Are analyses conducted on-site or off-site?

      ____ On-site ___X___ Off-site

      Identify off-site lab: See waste disposition Form attached

   c. Is F-solvent waste analyzed using TCLP? Generator uses his knowledge of waste and test analyses from off-site

      ____ Yes ___X___ No ____ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

      ____ Yes ___X___ No ____ NA TCLP hasn't been done For F006 waste.

      Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: Will probably be required yearly by receiving sites for wastes generated at G.E.

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

X Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

X Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

____ Tanks
X Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

X Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

X Yes ____ No

5. Do operating records agree with container labeling?

X Yes ____ No ____ NA

A mistake in number count of the food waste was found.

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

X Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes __X__ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No NA X

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect? NA

____ Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

C. <u>Treatment</u>

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

On-site treatment was determined to be exempt.

2. Describe the treatment processes:

_____

_____

_____

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Is dilution used as a substitute for treatment?

____ Yes ____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

____ Yes ____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

____ Yes ____ No ____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets the treatment standards	____ Yes	____ No

Identify off-site disposal facilities: _____

_____

_____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility? NA

____ Yes ____ No ____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

____ Yes ____ No

D. <u>Treatment in Surface Impoundments</u>

1. Are restricted wastes placed in surface impoundments for treatment?

____ Yes __X__ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No ____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

____ Yes ____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. **Land Disposal**

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

____ Yes _X_ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

____ Yes ____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

____ Yes ____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

____ Yes ____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

____ Yes ____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

____ Yes ____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	_X_No
trichloroethylene	_X_Yes	___No
methylene chloride	___Yes	_X_No
1,1,1-trichloroethane	_X_Yes	___No
carbon tetrachloride	___Yes	_X_No
chlorinated fluorocarbons	___Yes	_X_No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	___Yes	_X_No
trichloroethylene	___Yes	_X_No
methylene chloride	_X_Yes	___No
1,1,1-trichloroethane	_X_Yes	___No
chlorobenzene	___Yes	_X_No
trichlorofluoromethane	___Yes	_X_No
1,1,2-trichloro-1,2,2-trifluoroethane	_X_Yes	___No
ortho-dichlorobenzene	___Yes	_X_No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	_X_Yes	___No
acetone	___Yes	_X_No
ethyl acetate	___Yes	_X_No
ethyl benzene	___Yes	_X_No
ethyl ether	___Yes	_X_No
methyl isobutyl ketone	_X_Yes	___No
n-butyl alcohol	___Yes	_X_No
cyclohexanone	___Yes	_X_No
methanol	___Yes	_X_No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic? _X_Yes ___No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid	___Yes	_X_No
nitrobenzene	___Yes	_X_No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	_X_Yes	___No
methyl ethyl ketone	_X_Yes	___No
carbon disulfide	___Yes	_X_No
isobutanol	___Yes	_X_No
pyridine	___Yes	_X_No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Are the constituents used as chemical carriers?

___Yes ___No

If yes, list the constituents.

_____

_____

(b) Are the constituents used for degreasing/cleaning?

_X_Yes ___No

If yes, list the constituents.

trichloroethylene (no longer used), 1,1,1-trichloroethane, Freon, methylene chloride, xylene, toluene, MIBK and MEK.

(c) Are the constituents used as diluents?

_X_Yes ___No

If yes, list the constituents.

(Probably xylene, toluene, MIBK and MEK which are in the paint)

(d) Are the constituents used as extractants?

___Yes ___No

If yes, list the constituents.

_____

_____

(e) Are the constituents used for fabric scouring?

___Yes ___X No

If yes, list the constituents.

_____

_____

(f) Are the constituents used as reaction and synthesis media?

___Yes ___X No

If yes, list the constituents.

_____

_____

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.) ___X Yes ___No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of <u>all</u> the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

Xylene – 100% 17.3%
MEK – 10.9%
Toluene – 100%
MIBK – 15%

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains <u>only</u> F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
38%	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L) WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cycohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	0.44	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

APPENDIX C

DETAILED DESCRIPTION OF FIRST THIRD WASTE CODES

§ 261.31 Wastes

F006—Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum.

F007—Spent cyanide plating bath solutions from electroplating operations.

F008—Plating bath sludges from the bottom of plating baths from electroplating operations where cyanides are used in the process.

F009—Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.

F019—Wastewater treatment sludges from the chemical conversion coating of aluminum.

§ 261.32 Wastes

K001—Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.

K004—Wastewater treatment sludge from the production of zinc yellow pigments.

K008—Over residue from the production of chrome oxide green pigments.

K011—Bottom stream from the wastewater stripper in the production of acrylonitrile.

K013—Bottom stream from the acetonitrile column in the production of acrylonitrile.

K014—Bottoms from the acetonitrile purification column in the production of acrylonitrile.

K015—Still bottoms from the distillation of benzyl chloride.

K016—Heavy ends or distillation residues from the production of carbon tetrachloride.

K017—Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin.

K018—Heavy ends from the fractionation column in ethyl chloride production.

K019—Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.

K020—Heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production.

K021—Aqueous spent antimony catalyst waste from fluoromethanes production.

K022—Distillation bottom tars from the production of phenol/acetone from cumane.

K024—Distillation bottoms from the production of phthalic anhydride from naphthalene.

K025—Distillation bottoms from the production of nitrobenzene by the nitration of benzene.

K030—Column bottom or heavy ends from the combined production of trichloroethylene and perchloroethylene.

K031—By-products salts generated in the production of MSMA and cacodylic acid.

K035—Wastewater treatment sludges generated in the production of creosote.

K036—Still bottoms from toluene reclamation distillation in the production of disulfoton.

K037—Wastewater treatment sludge from the production of disulfoton.

K044—Wastewater treatment sludges from the manufacturing and processing of explosives.

K045—Spent carbon from the treatment of wastewater containing explosives.

K046—Wastewater treatment sludges from the manufacturing, formulation and loading of lead-based initiating compounds.

K047—Pink/red water from TNT operations.

K048—Dissolved air flotation (DAF) float from the petroleum refining industry.

K049—Stop oil emulsion solids from the petroleum refining industry.

K050—Heat exchange bundle cleaning sludge from the petroleum refining industry.

K051—API separator sludge from the petroleum refining industry.

K052—Tank bottoms (leaded) from the petroleum refining industry.

K060—Ammonia still lime sludge from coking operations.

K061—Emission control dust/sludge from the primary production of steel in electric furnaces.

K062—Spent pickle liquor from steel finishing operations in chlorine production.

K069—Emission control dust/sludge from secondary lead smelting.

K071—Brine purification muds from the mercury cells process in chlorine production, where separately prepurified brine is not used.

K073—Chlorinated hydrocarbon waste from the purification step of the diaphragm cell process using graphite anodes

K083—Distillation bottoms from aniline production.

K084—Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organoarsenic compounds.

K085—Distillation of fractionation column bottoms from the production of chlorobenzenes.

K086—Solvent washes and sludges; caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.

K087—Decanter tank tar sludge from coking operations.

K099—Untreated wastewater from the production of 2,4-D.

K100—Waste leaching solution from acid leaching of emission control dust/sludge from secondary lead smelting.

K101—Distillation tar residues from the distillation of aniline-based compounds in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K102—Residue from the use of activated carbon for decolorization in the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.

K103—Process residues from aniline extraction from the production of aniline.

K104—Combined wastewater streams generated from nitrobenzene/aniline production.

K106—Waste water treatment sludge from the mercury cell process in chlorine production.

§ 261.33(e) Wastes

P001—Warfarin, when present at concentration greater than 0.3%
P004—Aldrin
P005—Allyl alcohol
P010—Arsenic acid
P011—Arsenic (V) oxide
P012—Arsenic (III) oxide
P015—Beryllium dust
P016—Bis-(chloromethyl) ether
P018—Brucine
P020—Dinoseb
P030—Soluble cyanide salts not elsewhere specified
P036—Dichlorophenylarsine
P037—Dieldrin
P039—Disulfoton
P041—Diethyl-p-nitrophenyl phosphate
P048—2,4-Dinitrophenol
P050—Endosulfan
P058—Fluoracetic acid, sodium salt
P059—Heptachlor
P063—Hydrogen cyanide
P068—Methyl Hydrazine
P069—Methyllactonitrile
P070—Aldicarb
P071—Methyl parathion
P081—Nitroglycerine
P082—N-Nitrosodimethylamine
P084—N-Nitrosomethylvinylamine
P087—Osmium tetraoxide
P089—Parathion
P092—Phenylmercuric acetate
P094—Phorate
P097—Famphur
P102—Propargyl alcohol
P105—Sodium azide
P108—Strychnine and salts
P110—Tetraethyl lead
P115—Thallium (I) sulfate
P120—Vanadium pentoxide
P122—Zinc phosphide, when present at concentrations greater than 10%
P123—Toxaphene

§ 261.33(f) Wastes

U007—Acrylamide
U009—Acrylonitrile
U010—Mitomycin C
U012—Aniline
U016—Benz(c)acridine
U018—Benz(a)anthracene
U019—Benzene
U022—Benzo(a)pyrene
U029—Methyl bromide
U031—n-Butanol
U036—Chlordane, technical
U037—Chlorobenzene
U041—n-Chloro-2,3-epoxypropane
U043—Vinyl chloride
U044—Chloroform
U046—Chloromethyl methyl ether
U050—Chrysene
U051—Creosote
U053—Crotonaldehyde
U061—DDT
U063—Dibenz o (a, h) anthracene
U064—1,2:7,8 Dibenzopyrene
U066—Dibromo-3-chloropropane 1,2-
U067—Ethylene dibromide
U074—1,4-Dichloro-2-butene
U077—Ethane, 1,2-dichloro-
U078—Dichloroethylene, 1,1-
U086—N,N Diethylhydrazine
U089—Diethylstilbestrol
U103—Dimethyl sulfate
U105—2,4-Dinitrotoluene
U108—Dioxane, 1,4-
U115—Ethylene oxide
U122—Formaldehyde
U124—Furan
U129—Lindane
U130—Hexachlorocyclopentadiene
U133—Hydrazine
U134—Hydrofluoric acid
U137—Indeno(1,2,3-cd)pyrene
U151—Mecury
U154—Methanol
U155—Methapyrilene
U157—3-Methylcholanthrene
U158—4,4-Methylene-bis-(2-chloroaniline)
U159—Methyl ethyl ketone
U171—Nitropropane, 2-
U177—N-Nitroso-N-methylurea
U180—N-Nitrosopyrrolidine
U185—Pentachloronitrobenzene
U188—Phenol
U192—Pronamide
U200—Reserpine
U209—Tetrachloroethane, 1,1,2,2-
U210—Tetrachloroethylene
U211—Carbon tetrachloride
U219—Thiourea
U220—Toluene
U221—Toluenediamine
U223—Toluene diisocyanate
U226—Methylchloroform
U227—Trichloroethane, 1,1,2-
U228—Trichloroethylene
U237—Uracil mustard
U238—Ethyl carbamate
U248—Warfarin, when present at concentrations of 0.3% or less
U249—Zinc phosphide, when present at concentrations of 10% or less

APPENDIX D
TREATMENT STANDARDS

Waste Type: Pharmaceuticals Industry Subcategory Wastewater Revision

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition	Nonwastewaters: TCLP	Wastewaters: Total Composition (mg/l)	Wastewaters: TCLP
F001-F005	Wastewaters: Steam stripping process	Methylene Chloride			0.44	

Waste Type: Wastewater Treatment Sludges from Electroplating. See Regulations for exceptions.

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition (mg/k)	Nonwastewaters: TCLP (mg/l)	Wastewaters: Total Composition (mg/l)	Wastewaters: TCLP
F006	Nonwastewaters: Stabilization process using cement kiln dust as a binding agent.	Cadmium		0.066		
		Chromium (total)		5.2		
		Lead		0.51		
		Nickel		0.32		
		Silver		0.72		
	Wastewaters: Soft Hammer	Cyanides	Reserved	Reserved		

Waste Type: Bottom Sediment Sludge from the Treatment of Wastewaters from Wood Preserving Processes that Use Creosote and/or Pentachlorophenol.

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition	Nonwastewaters: TCLP (mg/kg)	Wastewaters: Total Composition (mg/l)	Wastewaters: TCLP
K001	Nonwastewaters and Wastewaters: Organic Constituents - rotary kiln incinerator	Napthalene	8.0		0.15	
		Pentachlorophenol	37.0		0.88	
		Phenanthrene	8.0		0.15	
		Pyrene	7.3		0.14	
		Toluene	0.14		0.14	
	Nonwastewaters: Metal Constituents - stabilization process	Xylenes	0.16		0.16	
		Lead		0.51	0.037	
	Wastewaters: Metal Constituents - chemical precipitation					

Waste Type: Still Bottoms from the Distillation of Benzyl Chloride

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition	Nonwastewaters: TCLP	Wastewaters: Total Composition (mg/l)	Wastewaters: TCLP
K015	Nonwastewaters: Liquid Injection Incinerator (based on premise of "no ash")	Anthracene	No land disposal	No land disposal	1.0	
		Benzal Chloride			0.28	
		Benzo (b and/or k) Fluoranthene			0.29	
		Phenanthrene			0.27	
	Wastewaters: Organic Constituents - liquid injection incineration	Toluene			0.15	
		Chromium (total)			0.32	
	Metal Constituents - chemical precipitation	Nickel			0.44	

Waste Type: Production of Chlorinated Chemicals in the Organic Chemical Industry: heavy ends or distillation residues from the production of carbon tetrachloride (K016); heavy ends from the fractionation column in ethyl chloride production (K018); heavy ends from the distillation of ethylene dichloride in ethylene dichloride production (K019); heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production (K020); column bottoms or heavy ends from the combined production of trichloroethylene and perchloroethylene (K030)

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition (mg/kg)	Nonwastewaters: TCLP	Wastewaters: Total Composition (mg/l)	Wastewaters: TCLP
K016	Nonwastewaters and Wastewaters: Organic Constituents - rotary kiln incineration	Hexachlorobenzene	28		0.033	
		Hexachlorobutadiene	5.6		0.007	
		Hexachlorocyclopentadiene	5.6		0.007	
		Hexachloroethane	28		0.033	
		Tetrachloroethene	6.0		0.007	
K018		Chloroethane	6.0		0.007	
		Chloromethane			0.007	
		1,1-Dichloroethane	6.0		0.007	
		1,2-Dichloroethane	6.0		0.007	
		Hexachlorobenzene	28		0.033	
		Hexachlorobutadiene	5.6		0.007	
		Hexachloroethane	28			
		Pentachloroethane	5.6		0.007	
		1,1,1-Trichloroethane	6.0		0.007	

Waste No.	BDAT	Constituents	Total Composition (mg/kg)	TCLP	Total Composition (mg/l)	TCLP
K019		Bis(2-Chloroethyl)ether	5.6		0.007	
		Chlorobenzene	6.0		0.006	
		Chloroform	6.0		0.007	
		p-Dichlorobenzene			0.008	
		1,2-Dichloroethane	6.0		0.007	
		Fluorene			0.007	
		Hexachloroethane	2.8		0.033	
		Naphthalene	5.6		0.007	
		Phenanthrene	5.6		0.007	
		1,2,4,5-Tetrachlorobenzene			0.017	
		Tetrachloroethene	6.0		0.007	
		1,2,4-Trichlorobenzene	19.0		0.023	
		1,1,1-Trichloroethane	6.0		0.007	
K020		1,2-Dichloroethane	6.0		0.007	
		1,1,2,2-Tetrachloroethane	5.6		0.007	
		Tetrachloroethene	6.0		0.007	
K030		o-Dichlorobenzene			0.008	
		p-Dichlorobenzene			0.008	
		Hexachlorobutadiene	5.6		0.007	
		Hexachloroethane	28		0.033	
		Hexachloropropene	19			
		Pentachlorobenzene	28			
		Pentachloroethane	5.6		0.007	
		1,2,4,5-Tetrachlorobenzene	14		0.017	
		Tetrachloroethene	6.0		0.007	
		1,2,4-Trichlorobenzene	19		0.023	

Waste Type: Distillation Bottom Tars from the Production of Phenol/Acetone from Cumene

			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition (mg/k)	TCLP (mg/l)	Total Composition	TCLP
K022	Nonwastewaters: Organic Constituents - fuel substitution unit Metal Constutuents - stabilization treatment process	Acetophenone	19			
		Sum of Diphenylamine and Diphenylnitrosamine	13			
		Phenol	12			
		Toluene	0.034			
		Chromium (total)		5.2		
		Nickel		0.32		

Waste Type: Distillation Bottom Tars from the Production of Phthalic Anhydride from Naphthalene

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition (mg/kg)	Nonwastewaters: TCLP	Wastewaters: Total Composition (mg/l)	Wastewaters: TCLP
K024	Nonwastewaters and Wastewaters: Rotary Kiln Incineration	Phthalic Acid	28		0.54	

Waste Type: Wastewater Treatment Sludge from the Production of Disulfoton

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition (mg/kg)	Nonwastewaters: TCLP	Wastewaters: Total Composition (mg/l)	Wastewaters: TCLP
K037	Nonwastewaters and Wastewaters: Rotary Kiln Incineration	Disulfoton Toluene	0.1 28		0.003 0.028	

Waste Type: Explosives Industry: Wastewater Treatment Sludges from the Manufacturing and Processing of Explosives (K044); Spent Carbon from the Treatment of Wastewater Containing Explosives (K045); Pink/Red Water from TNT Operations (K047).

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition	Nonwastewaters: TCLP	Wastewaters: Total Composition	Wastewaters: TCLP
K044 K045 K047	Open detonation/ open burning/chemical deactivation		No land disposal based on reactivity.		No land disposal based on reactivity.	

Waste Type: Wastewater Treatment Sludges from the Manufacturing, Formulation, and Loading of Lead-Based Initiating Compounds

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition	Nonwastewaters: TCLP (mg/l)	Wastewaters: Total Composition	Wastewaters: TCLP
	Nonwastewaters (nonreactive subcategory): Stabilization Process	Lead		0.18		

Waste Type: Petroleum Refining Industry: Dissolved Air Flotation Float (K048); Slop Oil Emulsion Solids (K049); Heat Exchanger Bundle Cleaning Sludge (K050); API Separator Sludge (K051); and Leaded Tank Bottoms (K052)

Waste No.	BDAT	Constituents	Nonwastewaters: Total Composition (mg/kg)	Nonwastewaters: TCLP (mg/l)	Wastewaters: Total Composition (mg/l)	Wastewaters: TCLP
K048	Nonwastewaters: Organic Constituents - solvent extraction and/or incineration Metal Constituents - stabilization process	Benzene	9.5		0.011	
		Benzo(a)pyrene	0.84		0.047	
		Bis(2-ethylhexyl)phthalate	37		0.043	
		Chrysene	2.2		0.043	
		Di-n-butyl Phthalate	4.2		0.060	
		Ethylbenzene	67		0.011	
		Fluorene			0.050	
	Wastewaters: Organic Constituents - incineration	Naphthalene	Reserved		0.033	
		Phenanthrene	7.7		0.039	
		Phenol	2.7		0.047	
	Metal Constituents - chromium reduction, lime and sulfide precipitation, and vacuum filtration	Pyrene	2.0		0.045	
		Toluene	9.5		0.011	
		Xylenes	Reserved		0.011	
		Cyanides (total)	1.8			
		Arsenic		0.004		
		Chromium (total)		1.7	0.20	
		Nickel		0.048		
		Selenium		0.025		
		Lead			0.037	
K049		Anthracene	6.2		0.039	
		Benzene	9.5		0.011	
		Benzo(a)pyrene	0.84		0.047	
		Bis(2-ethylhexyl)phthalate	37		0.043	
		Carbon Disulfide			0.011	
		Chrysene	2.2		0.043	
		2,4-Dimethylphenol			0.033	
		Ethylbenzene	67		0.011	

K049	(Continued)			
	Naphthalene	Reserved		0.033
	Phenanthrene	7.7		0.039
	Phenol	2.7		0.047
	Pyrene	2.0		0.045
	Toluene	9.5		0.011
	Xylenes	Reserved		0.011
	Cyanides (total)	1.8		
	Arsenic		0.004	
	Chromium (total)		1.7	0.020
	Nickel		0.048	
	Selenium		0.025	
	Lead			0.037
K050	Benzo(a)pyrene	0.084		0.047
	Phenol	2.7		0.047
	Cyanides (total)	1.8		
	Arsenic		0.004	
	Chromium (total)		1.7	0.20
	Nickel		0.048	
	Selenium		0.025	
	Lead			0.037
K051	Acenaphthene			0.050
	Anthracene	6.2		0.039
	Benzene	9.5		0.011
	Benzo(a)anthracene	1.4		0.043
	Benzo(a)pyrene	0.84		0.047
	Bis(2-ethylhexyl)phthalate	37		0.043
	Chrysene	2.2		0.043
	Di-n-butyl Phthalate	4.2		0.060
	Ethylbenzene	67		0.011
	Fluorene			0.050
	Naphthalene	Reserved		0.033
	Phenanthrene	7.7		0.039
	Phenol	2.7		0.047
	Pyrene	2.0		0.045
	Toluene	9.5		0.011
	Xylenes	Reserved		0.011
	Cyanides (total)	1.8		
	Arsenic		0.004	
	Chromium (total)		1.7	0.20
	Nickel		0.048	
	Selenium		0.025	
	Lead			0.037
K052	Benzene	9.5		0.011
	Benzo(a)pyrene	0.84		0.047
	o-Cresol	2.2		0.011
	p-Cresol	0.90		0.011
	2,4-Dimethylphenol			0.033
	Ethylbenzene	67		0.011
	Naphthalene	Reserved		0.033
	Phenanthrene	7.7		0.039
	Phenol	2.7		0.047
	Toluene	9.5		0.011
	Xylenes	Reserved		0.011

K052	..ontinued)	Cyanides (total)	1.8			
		Arsenic		0.004		
		Chromium (total)		1.7		0.20
		Nickel		0.048		
		Selenium		0.025		
		Lead				0.037

Waste Type: Emission Control Dust/Sludge from Primary Production of Steel in Electric Furnaces

			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP (mg/l)	Total Composition	TCLP
K061	Nonwastewaters: High Zinc (15% or greater) Subcategory - high temperature metals recovery unit (HTMR) Low Zinc (less than 15%) Subcategory - stabilization	Cadmium		0.14		
		Chromium (total)		5.2		
		Lead		0.24		
		Nickel		0.32		

Waste Type: Spent Pickle Liquor Generated by Steel Finishing Operations of Facilities Within the Iron and Steel Industries

			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP (mg/l)	Total Composition (mg/l)	TCLP
K062	Nonwastewaters and Wastewaters: Chromium Reduction, Chemical Precipitation with Sulfide, Settling, Filtering and Dewatering of Solid Residues	Chromium (total)		0.094	0.032	
		Lead		0.037	0.04	
		Nickel			0.44	

Waste Type: Emission Control Dust/Sludge from Secondary Lead Smelting			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP	Total Composition	TCLP
K069	Nonwastewaters in Non-Calcium Sulfate Subcategory: recycling		No land disposal based on recycling.			

Waste Type: Brine Purification Muds from the Mercury Cell Process in Chlorine Production, where Separately Prepurified Brine is Not Used			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP (mg/l)	Total Composition (mg/l)	TCLP
K071	Nonwastewaters: Solubilize mercury in sludge and convert to insoluble mercury sulfide sludge.	Mercury		0.025	0.030	

Waste Type: Distillation Bottoms from Aniline Production			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP	Total Composition	TCLP
K083	Nonwastewaters and Wastewaters: No Ash Subcategory - Liquid injection incinerator		No land disposal based on no ash.			

Waste Type: Solvent Washes and Sludges, Caustic Washes and Sludges, or Waterwashes and Sludges From the Cleaning of Tubs and Equipment Used in the Formulation of Ink Pigments, Driers, Soaps, and Stabilizers Containing Chromium and Lead

Waste No.	BDAT	Constituents	Nonwastewaters Total Composition (mg/kg)	Nonwastewaters TCLP (mg/l)	Wastewaters Total Composition (mg/l)	Wastewaters TCLP
K086	Nonwastewaters and Wastewaters, Solvent Washes Subcategory: Organic Constituents - incineration Metal Constituents - hexavalent chromium reduction, chemical precipitation with excess lime, filtration	Acetone	0.37		0.015	
		Bis(2-ethylhexyl)phthalate	0.49		0.044	
		n-Butyl Alcohol	0.37		0.031	
		Cyclohexanone	0.49		0.022	
		1,2-Dichlorobenzene	0.49		0.044	
		Ethyl Acetate	0.37		0.031	
		Ethyl Benzene	0.031		0.015	
		Methanol	0.37		0.031	
		Methylene Chloride	0.037		0.031	
		Methyl Ethyl Ketone	0.37		0.031	
		Methyl Isobutyl Ketone	0.37		0.031	
		Naphthalene	0.49		0.044	
		Nitrobenzene	0.49		0.044	
		Toluene	0.031		0.029	
		1,1,1-Trichloroethane	0.044		0.031	
		Trichloroethylene	0.031		0.029	
		Xylenes	0.015		0.015	
		Chromium (total)		0.094	0.32	
		Lead		0.37	0.037	

Waste Type: Decanter Tank Tar Sludge from Coking Operations

Waste No.	BDAT	Constituents	Nonwastewaters Total Composition (mg/kg)	Nonwastewaters TCLP (mg/l)	Wastewaters Total Composition (mg/l)	Wastewaters TCLP
K087	Nonwastewaters and Wastewaters: Organic Constituents - incineration in rotary kiln Metal Constituents - hexavalent chromium reduction, chemical precipitation with excess lime, filtration	Acenaphthalene	3.4		0.028	
		Benzene	0.071		0.014	
		Chrysene	3.4		0.028	
		Fluoranthene	3.4		0.028	
		Indeno (1,2,3-cd) pyrene	3.4		0.028	
		Naphthalene	3.4		0.028	
		Phenanthrene	3.4		0.028	
		Toluene	0.65		0.008	
		Xylenes	0.070		0.014	
		Lead		0.51	0.037	

Waste Type: Untreated Wastewater from the Production of 2,4-Dichlorophenoxyacetic Acid (2,4,D)

Waste No.	BDAT	Constituents	Nonwastewaters Total Composition (mg/kg)	Nonwastewaters TCLP	Wastewaters Total Composition (mg/l)	Wastewaters TCLP
K099	Nonwastewaters and Wastewaters: Chemical oxidation using chlorine.	2,4-Dichlorophenoxyacetic Acid	1.0		1.0	
		Hexachlorodibenzo-p-dioxins	0.001		0.001	
		Hexachlorodibenzofurans	0.001		0.001	
		Pentachlorodibenzo-p-dioxins	0.001		0.001	
		Pentachlorodibenzofurans	0.001		0.001	
		Tetrachlorodibenzo-p-dioxins	0.001		0.001	
		Tetrachlorodibenzofurans	0.001		0.001	

Waste Type: Production of Vetinary Pharmaceuticals from Arsenic or Organo Arsenic Compounds: Distillation Tar Residues from the Distillation of Aniline-Based Compounds (K101); Residue from the Use of Activated Carbon for Discolorization (K102)

Waste No.	BDAT	Constituents	Nonwastewaters Total Composition (mg/kg)	Nonwastewaters TCLP (mg/l)	Wastewaters Total Composition (mg/l)	Wastewaters TCLP
K101	Nonwastewaters and Wastewaters: Low Arsenic (less than 1% total arsenic) Subcategory - incineration in rotary kiln	Ortho-Nitroaniline	14		0.27	
		Cadmium		0.066	2.0	
		Chromium (total)		5.2	0.24	
		Lead		0.51	0.11	
		Nickel		0.32	0.027	
K102		Ortho-Nitrophenol	13		0.028	
		Cadmium		0.066	2.0	
		Chromium (total)		5.2	0.24	
		Lead		0.51	0.11	
		Nickel		0.32	0.027	

Waste Type: Production of Aniline and Nitrobenzene/Aniline Process Residues from Aniline Extraction (K103) and Combined Wastewater Streams Generated from Nitrobenzene/Aniline Production (K104)

Waste No.	BDAT	Constituents	Nonwastewaters Total Composition (mg/k)	Nonwastewaters TCLP	Wastewaters Total Composition (mg/l)	Wastewaters TCLP
K103	Nonwastewaters and Wastewaters: Organic Constituents - solvent extraction, steam stripping, activated carbon adsorption, and incineration	Aniline	5.6		4.5	
		Benzene	6.0		0.15	
		2,4-Dinitrophenol	5.6		0.61	
		Nitrobenzene	5.6		0.073	
		Phenol	5.6		1.4	
K104		Aniline	5.6		4.5	
		Benzene	6.0		0.15	
		2,4-Dinitrophenol	5.6		0.61	
		Nitrobenzene	5.6		0.073	
		Phenol	5.6		1.4	
		Cyanides (total)	1.8		2.7	

Waste Type: Wastewater Treatment Sludge from the Production of Zinc Yellow Pigments

Waste No.	BDAT	Constituents	Nonwastewaters Total Composition	Nonwastewaters TCLP	Wastewaters Total Composition	Wastewaters TCLP
K004	No land disposal based on no generation.					

Waste Type: Oven Residue from the Production of Chrome Oxide Green Pigments

Waste No.	BDAT	Constituents	Nonwastewaters Total Composition	Nonwastewaters TCLP	Wastewaters Total Composition	Wastewaters TCLP
K008	No land disposal based on no generation.					

Waste Type: Aqueous Spent Antimony Catalyst Waste From Fluoromethanes Production			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP	Total Composition	TCLP
K021	No land disposal based on no generation.					

Waste Type: Distillation Bottoms from the Production of Nitrobenzene by the Nitration of Benzene			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP	Total Composition	TCLP
K025	No land disposal based on no generation.					

Waste Type: Still Bottoms from Toluene Reclamation Distillation in the Production of Disulfoton			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP	Total Composition	TCLP
K036	No land disposal based on no generation.					

Waste Type: Ammonia Still Lime Sludge from Coking Operations			Nonwastewaters		Wastewaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP	Total Composition	TCLP
K060	No land disposal based on no generation.					

Waste Type: Waste Leaching Solution from Acid Leaching of Emission Control Dust/Sludge from Secondary Lead Smelting

Waste No.	BDAT	Constituents	Nonwastewaters		Wastewaters	
			Total Composition	TCLP	Total Composition	TCLP
K100	No land disposal based on no generation.					

Daily Analytical Laboratories
1621 W. Candletree Drive Peoria, Illinois 61614 Tel. (309) 692-5252

ceived: 04/22/88 05/24/88 09:55:32 Continued From Above

est	Units	#78 Wastewater Sludge	#83 Wastewater Sludge
ead, EP Toxicity	mg/l	<0.01	<0.01
P TOX Extraction	date of prep.	05/03/88	05/03/88
lkalinity/Acidity	mg/kg	59000	70000
yanide, Reactive	mg/kg	<2.0	<2.3
yanide, Total	mg/kg	2.0	2.3
hromium, Hexavalent	mg/l	<2.0	<2.0
aint Filter	none	pass	pass
lashpoint	degrees F	>200	>200
henol	mg/kg	<2.6	<2.7
H Nonaqueous	units	9.4	9.4
eactive Sulfide	mg/kg	<1.0	<1.2
otal Sulfide	mg/kg	1.0	<1.2
otal Solids	%w/w	24	24

Certified By: _____

ATTACHMENT 6

3-7-88

Daily Analytical Laboratories
1621 W. Candletree Drive Peoria, Illinois 61614 Tel. (309) 692-5252

General Electric Company
P.O. Box 2915
Bloomington, IL 61701

Attn: Mr. Tom Atzen

Work ID: Wastewater Sludges
P O # :

Date Received: 04/22/88
Date of Report: 05/24/88
Work Order: 88-04-533
Job Number: 6480_01
QC Level:

Test	Units	#78 Wastewater Sludge	#83 Wastewater Sludge
Silver, Total	mg/kg	1.6	8.4
Arsenic, Total	mg/kg	<1.0	<1.0
Barium, Total	mg/kg	51	49
Cadmium, Total	mg/kg	8.8	9.1
Chromium, Total	mg/kg	900	960
Mercury, Total	mg/kg	0.05	0.05
Lead, Total	mg/kg	210	220
Selenium, Total	mg/kg	<1.0	<1.0
Metals Digest Nonaqueous	date of prep.	04/26/88	04/26/88
Cadmium, EP Toxicity	mg/l	<0.005	<0.005
Chromium, EP Toxicity	mg/l	0.01	0.02

DA Daily Analytical Laboratories
1621 W. Candletree Drive Peoria, Illinois 61614
Tel. (309) 692-5252

General Electric Company
P.O. Box 2915
Bloomington, IL 61701

Attn: Mr. Tom Atzen

DATE RECEIVED March 22, 1988

D/A JOB NO: 5060.10

DATE OF REPORT: May 25, 1988

Analysis certified by: Patricia A. Schultz-Benker

Patricia A. Schultz-Benker
Senior Residues Chemist

Daily Analytical Laboratories
1621 W. Candletree Drive Peoria, Illinois 61614
Tel. (309) 692-5252

General Electric Company DATE OF REPORT: May 25, 1988

SAMPLE DESCRIPTION		#78 W/W sludge	# 83 W/W sludge
Sample Date		4/22/88	4/22/88
VINYL CHLORIDE	UG/L	<10	<10
METHYLENE CHLORIDE	UG/L	16 B	21 B
TRICHLOROFLUOROMETHANE	UG/L	<5	<5
1,1-DICHLOROETHENE	UG/L	<5	<5
CHLOROFORM	UG/L	<5	<5
1,2-DICHLOROETHANE	UG/L	<5	<5
1,1,1-TRICHLOROETHANE	UG/L	<5	<5
CARBON TETRACHLORIDE	UG/L	<5	<5
TRICHLOROETHYLENE	UG/L	250	330
BENZENE	UG/L	<5	<5
1,1,2-TRICHLOROETHANE	UG/L	<5	<5
1,1,1,2-TETRACHLOROETHANE	UG/L	<5	<5
1,1,2,2-TETRACHLOROETHANE	UG/L	<5	<5
TETRACHLOROETHYLENE	UG/L	<5	<5
TOLUENE	UG/L	<5	<5
CHLOROBENZENE	UG/L	<5	<5
ETHYLBENZENE	UG/L	<5	<5
CARBON DISULFIDE	UG/L	<5	<5
TOTAL XYLENES	UG/L	<5	<5
ACETONE	UG/L	79 B	250 B
2-BUTANONE	UG/L	<10	<10
4-METHYL-2-PENTANONE	UG/L	27 B	<10
ACRYLONITRILE	UG/L	<50	<50
n-BUTYL ALCOHOL	UG/L	<250	<250
ETHYL ACETATE	UG/L	<10	<10
ETHYL ETHER	UG/L	<10	<10
ISOBUTYL ALCOHOL	UG/L	<250	<250
1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	UG/L	<10	<10

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1130200016 -- McLean County
General Electric Co.
ILD005453691
RCRA - Permits

Attn: Environmental Coordinator
or Plant Manager

May 6, 1988

General Electric Co.
1601 GE Road
Bloomington, IL 61701

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For you convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the rgistered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to $25,000 per day of noncompliance.

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9878.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKM:mab/1203j/1204j/

Enclosures

cc: Division File
Compliance
Springfield Region
USPEA Region V

5HS-12

0 8 MAR 1988

Mr. Don Samdahl
General Electric Company
1601 G.E. Road
Bloomington, Illinois 61702

Re: General Electric Company
ILD 005 453 691

Dear Mr. Samdahl:

The United States Environmental Protection Agency (U.S. EPA) has reviewed the information which you submitted to this office on February 17, 1988. The stated actions appear to adequately address the land disposal restrictions deficiency outlined in our January 21, 1988, Notice of Violation.

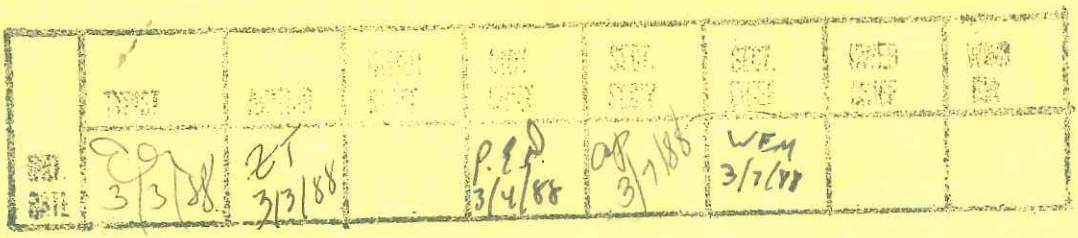
Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Zetta L. Thomas of my staff at (312) 886-4581.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM E. MUNO
William E. Muno, Chief
RCRA Enforcement Branch

cc: H. Chappel, IEPA
G. Savage, IEPA

5HS-12:ZTHOMAS:3/3/88:ea DISK #3



GENERAL ELECTRIC

CONTROL COMPONENTS & EQUIPMENT
GENERAL PURPOSE CONTROL COMPONENTS
GENERAL ELECTRIC COMPANY • P. O. BOX 2913 • BLOOMINGTON, ILLINOIS 61702-2913 • (309) 662-4311

February 17, 1988

Certified Mail
Return Receipt Requested

Mr. William E. Muno, Chief
RCRA Enforcement Section
U. S. Environmental Protection Agency
Region 5
230 South Dearborn St.
Chicago, IL

Ref: Notice of Violation
General Electric Company
ILD 005453691
5HE-12

Dear Mr. Muno,

In response to your letter dated January 21, 1988, and the Illinois EPA inspection of August 28, 1987, the following information is forwarded in reply to the noted land disposal restrictions.

1. 40CFR268.7(a)(1) - Attached are copies of notifications sent with shipments of waste solvent made on 8/11/87, 8/25/87 (both prior to the inspection), and 12/9/87. The appropriate Illinois Manifest numbers are noted on the information sheet.

2. 40CFR265.13 and 35 Ill Adm Code 725.113 to include provisions of 40CFR Part 268. - Attached is a copy of our Waste Analysis Plan modified to include the provisions for restricted solvents for land disposal.

This information should satisfy any questions regarding the Notice of Violation.

Please let me know if you need further information.

Very truly yours,

D. H. Samdahl

D. H. Samdahl
Industrial Hygiene, Safety
and Environmental Affairs

6081D/gh

ATTACHMENT 1

LAND DISPOSAL RESTRICTIONS INFORMATION - RESTRICTED WASTE FOR INCINERATION

Customer Name: GENERAL ELECTRIC Co

EPA ID Number: ILD 005453691

Reference Number: CS-49

Address: 1601 G.E. ROAD

BLOOMINGTON

ILLINOIS 61701

Under manifest number IL 1813281 we are shipping to you, for incineration, a waste stream classifed by EPA Hazardous Waste Number F002.

This stream contains the following constituents identified in Table CCWE of 40 CFR 268.41 (copy below) and must be treated at least to the level specified below (use reverse side for additional constituents):

Constituent	Treatment Standard
METHYLENE CHLORIDE	0.96

The above constituent composition is based upon, [ ] an attached waste analysis or [ ] my thorough knowledge of the waste stream.

TABLE CCWE - CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l) Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2 - dichlorobenzene	.68	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1 - Trichloroethane	1.05	0.41
1,2,2 - Trichloro - 1,2,2 trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Authorized representative signature D.N. Saindhe

Print or type name D. N. SAINDHE

Title ENG. Date 12-9-87

ATTACHMENT 1

LAND DISPOSAL RESTRICTIONS INFORMATION - RESTRICTED WASTE FOR INCINERATION

Customer Name: GENERAL ELECTRIC COMPANY

EPA ID Number: ILD 005453691

Reference Number: CS-50

Address: 1601 GE ROAD

BLOOMINGTON,

ILLINOIS 61701

Under manifest number IL181328I we are shipping to you, for incineration, a waste stream classified by EPA Hazardous Waste Number F003 / F005.

This stream contains the following constituents identified in Table CCWE of 40 CFR 268.41 (copy below) and must be treated at least to the level specified below (use reverse side for additional constituents):

Constituent	Treatment Standard
XYLENE	0.15
TOLUENE	0.33

The above constituent composition is based upon, [ ] an attached waste analysis or [X] my thorough knowledge of the waste stream.

TABLE CCWE - CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l) Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1.2 - dichlorobenzene	.68	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1 - Trichloroethane	1.05	0.41
1,2,2 - Trichloro - 1,2,2 trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
hlorofluoromethane	0.05	0.96
ne	0.05	0.15

Authorized representative signature D.H. Samdahl

Print or type name D.H. SAMDAHL

Title ENGR Date 12-9-87

ATTACHMENT 1

LAND DISPOSAL RESTRICTIONS INFORMATION - RESTRICTED WASTE FOR INCINERATION

Customer Name: GENERAL ELECTRIC COMPANY

EPA ID Number: ILD 005453694

Reference Number: CS-52

Address: 1601 G.E. ROAD

BLOOMINGTON

ILLINOIS 61701

Under manifest number ILL81 3281 we are shipping to you, for incineration, a waste stream classifed by EPA Hazardous Waste Number F002.

This stream contains the following constituents identified in Table CCWE of 40 CFR 268.41 (copy below) and must be treated at least to the level specified below (use reverse side for additional constituents):

Constituent	Treatment Standard
METHYLENE CHLORIDE	0.96
C	

The above constituent composition is based upon, [ ] an attached waste analysis or [X] my thorough knowledge of the waste stream.

TABLE CCWE - CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l) Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2 - dichlorobenzene	.68	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1 - Trichloroethane	1.05	0.41
1,2,2 - Trichloro - 1,2,2 trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Authorized representative signature D. W. Samdahl

Print or type name D. W. SAMDAHL

Title ENGR Date 12-9-87

LAND DISPOSAL RESTRI ION'S INFORMATION - RESTRIC D W STE FOR INCINERATION

Customer Name: GENERAL ELECTRIC CO

EPA ID Number: ILD 005453691

Reference Number: _____

Address: 1601 G.E. ROAD
BLOOMINGTON, IL 61701

Under manifest number IL 1813279 we are shipping to you, for incineration, a waste stream classifed by EPA Hazardous Waste Number F002.

This stream contains the following constituents identified in Table CCWE of 40 CFR 268.41 (copy below) and must be treated at least to the level specified below (use reverse side for additional constituents):

Constituent	Treatment Standard
TRICHLOROETHYLENE	0.091

The above constituent composition is based upon, [ ] an attached waste analysis or [X] my thorough knowledge of the waste stream.

TABLE CCWE - CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l) Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.98
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2 - dichlorobenzene	.68	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1 - Trichloroethane	1.05	0.41
1,2,2 - Trichloro - 1,2,2 trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.98
Xylene	0.05	0.15

Authorized representative signature D. W. Sandahl

Print or type name D. W. SANDAHL

Title ENGR Date 8-25-87

ATTACHMENT 1

LAND DISPOSAL RESTRICTION INFORMATION - RESTRICTED WASTE FOR INCINERATION

Customer Name: GENERAL ELECTRIC CO

EPA ID Number: ILD 005453691

Reference Number:

Address: 1601 G.E. ROAD
BLOOMINGTON, IL 61701

Under manifest number IL 1813279 we are shipping to you, for incineration, a waste stream classifed by EPA Hazardous Waste Number F002.

This stream contains the following constituents identified in Table CCWE of 40 CFR 268.41 (copy below) and must be treated at least to the level specified below (use reverse side for additional constituents):

Constituent	Treatment Standard
TRICHLORDETHYLENE	0.091

The above constituent composition is based upon, [ ] an attached waste analysis or [X] my thorough knowledge of the waste stream.

TABLE CCWE - CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l) Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2 - dichlorobenzene	.68	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1 - Trichloroethane	1.05	0.41
1,2,2 - Trichloro - 1,2,2 trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Authorized representative signature D. H. Samdahl

Print or type name D. H. SAMDAHL

Title ENGR Date 8-25-87

ATTACHMENT 1

LAND DISPOSAL RESTRICTIONS INFORMATION - RESTRICTED WASTE FOR INCINERATION

Customer Name: GENERAL ELECTRIC Co.

EPA ID Number: ILD 005453691

Reference Number: _____

Address: 1601 G.E. ROAD
BLOOMINGTON, IL 61701

Under manifest number IL 1813276 we are shipping to you, for incineration, a waste stream classified by EPA Hazardous Waste Number F003.

This stream contains the following constituents identified in Table CCWE of 40 CFR 268.41 (copy below) and must be treated at least to the level specified below (use reverse side for additional constituents):

Constituent	Treatment Standard
XYLENE	0.15

The above constituent composition is based upon, [ ] an attached waste analysis or [X] my thorough knowledge of the waste stream.

TABLE CCWE - CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l) Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2 - dichlorobenzene	.68	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1 - Trichloroethane	1.05	0.41
1,2,2 - Trichloro - 1,2,2 trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Authorized representative signature D W Samdahl

Print or type name D.W. SAMDAHL

Title ENGR Date 8-11-87

ATTACHMENT 1

LAND DISPOSAL RESTRICTIONS INFORMATION - RESTRICTED WASTE FOR INCINERATION

Customer Name: GENERAL ELECTRIC CO

EPA ID Number: ILD 005453691

Reference Number: [illegible]

Address: 1601 G.E. ROAD
BLOOMINGTON, IL 61701

Under manifest number IL 1813276 we are shipping to you, for incineration,
a waste stream classifed by EPA Hazardous Waste Number F001

This stream contains the following constituents identified in Table CCWE of 40 CFR 268.41 (copy below) and must be treated at least to the level specified below (use reverse side for additional constituents):

Constituent	Treatment Standard
METHYLENE CHLORIDE	.96

The above constituent composition is based upon, [ ] an attached waste analysis or [ ] my thorough knowledge of the waste stream.

TABLE CCWE - CONSTITUENT IN WASTE EXTRACT

F001-F005 spent solvents	Concentration (in mg/l) Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
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Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.65	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1 - Trichloroethane	1.05	0.41
1,2,2 - Trichloro - 1,2,2 trifluroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Authorized representative signature D.N. Samdahl

Print or type name D. N. SAMDAHL

Title ENGR Date 8-11-87

SECTION 725.113 GENERAL WASTE ANALYSIS

This analysis plan covers the procedures used to determine whether or not a waste is hazardous as defined by "State of Illinois Rules and Regulation Title 35: Environmental Protection Subtitle G."

I. CHAIN OF CUSTODY

1. Chain of custody establishes the documentation and control necessary to identify and trace a sample from sample collection to final analysis. Such documentation includes labeling to prevent mix up, container seals to prevent unauthorized tampering with contents of the sample containers, secure custody, and the necessary records to support potential litigation.

2. Sample labels must be used to prevent mis-identification of samples. Gummed paper labels or tags are adequate. The label must include at least the following information:

    a. Name of collector.
    b. Date and time of collection.
    c. Place of collection.
    d. Collector's sample number, which uniquely identifies the sample.

3. Sample seals must be used to preserve the integrity of the sample from the time it is collected until it is opened in the laboratory. Gummed paper seals may be used for this purpose. The paper seal must include, at least, the following information:

    a. Collector's name.
    b. Date and time of sampling.
    c. Collector's sample number. (This number must be identical with the number on the sample label.)

    The seal must be attached in such a way that it is necessary to break it in order to open the sample container.

4. All information pertinent to a field survey and/or sampling must be recorded in a log book. This must be a bound book and entries in the log book should include at least the following:

    a. Purpose of sampling (e.g., surveillance, contract number).
    b. Location address.
    c. Location of sampling point.
    d. Type of process (if known) producing waste.
    e. Type of waste (e.g., sludge, wastewater).
    f. Suspected waste composition including concentrations.
    g. Number and volume of sample taken.

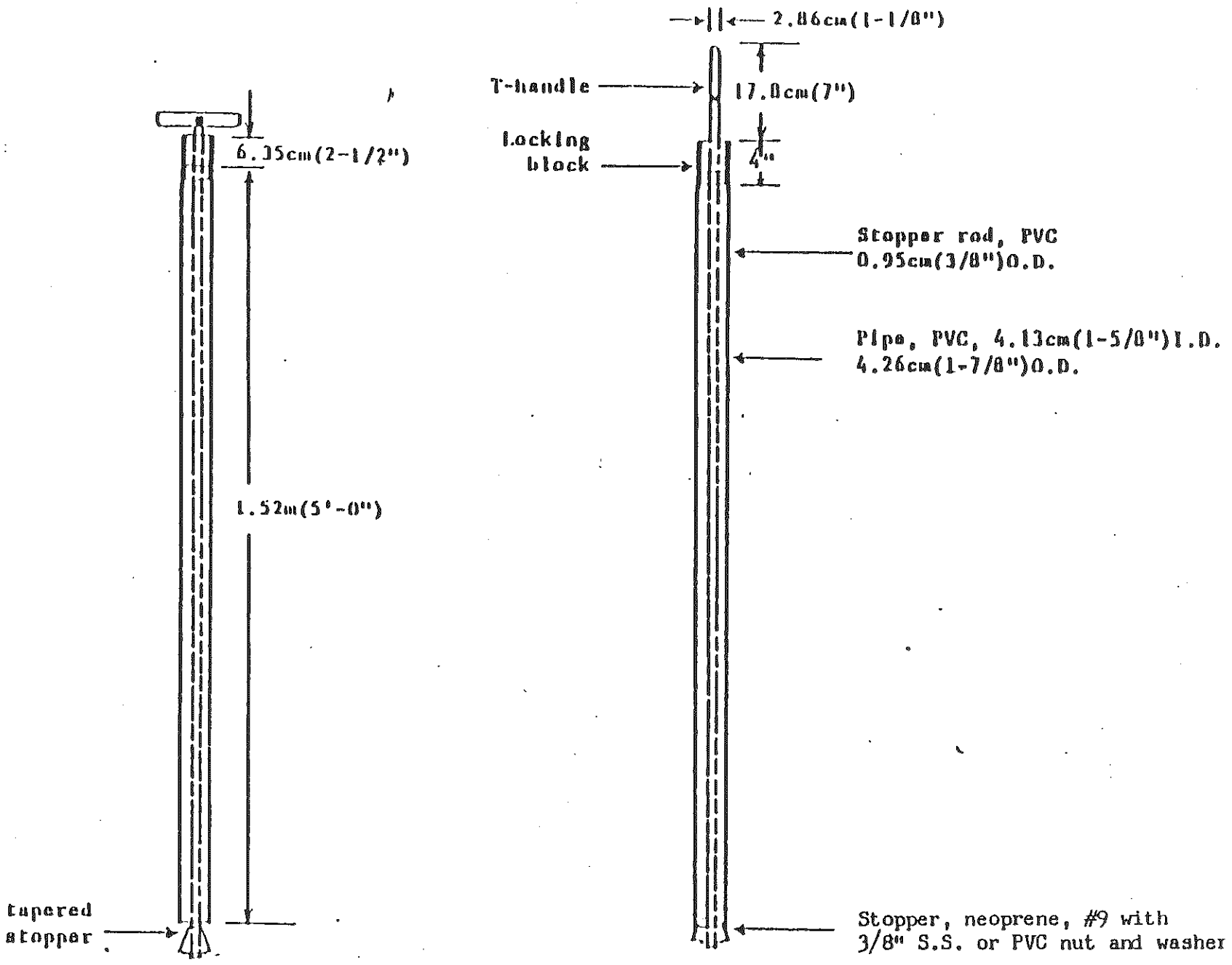
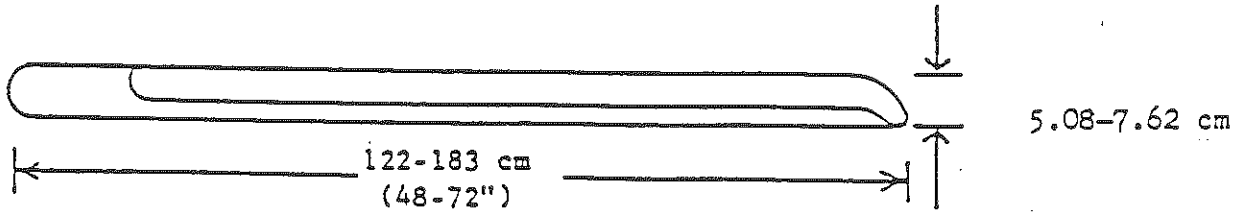

6.35cm(2-1/2")
1.52m(5'-0")
tapered stopper
SAMPLING POSITION
2.86cm(1-1/8")
T-handle
17.8cm(7")
locking block
4"
Stopper rod, PVC 0.95cm(3/8")O.D.
Pipe, PVC, 4.13cm(1-5/8")I.D. 4.26cm(1-7/8")O.D.
Stopper, neoprene, #9 with 3/8" S.S. or PVC nut and washer
CLOSE POSITION

Figure 1



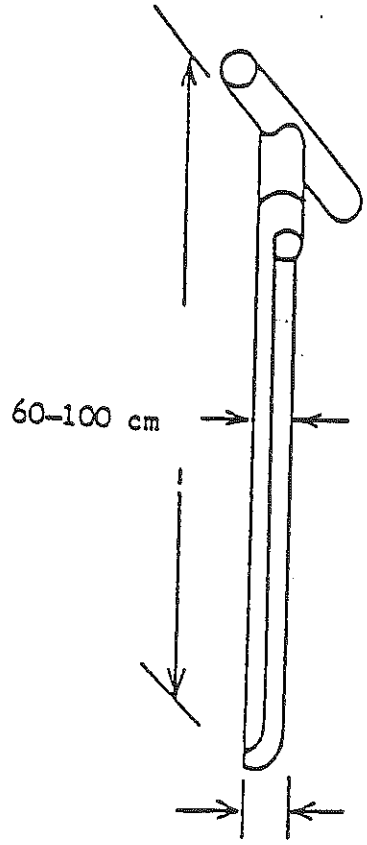


Figure 2
SAMPLING TRIERS

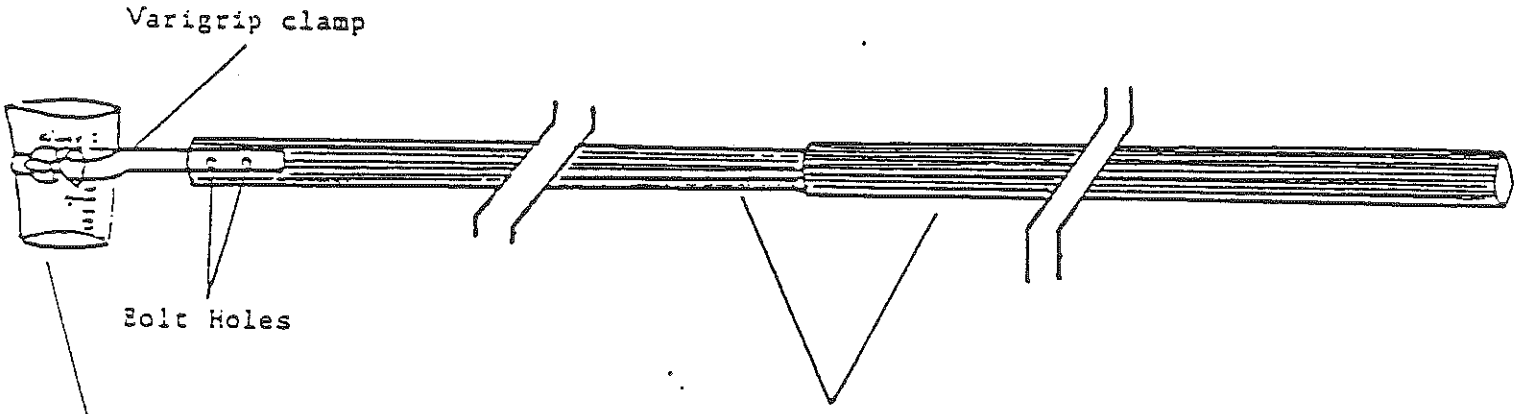


Figure
DIPPER

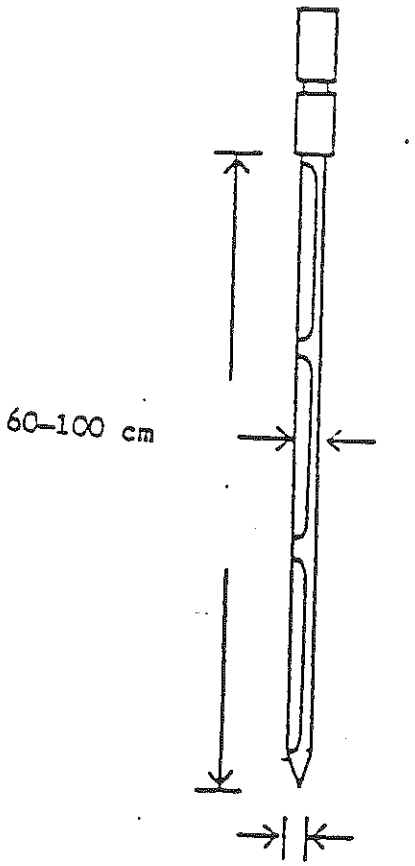


Figure 4
THIEF SAMPLER

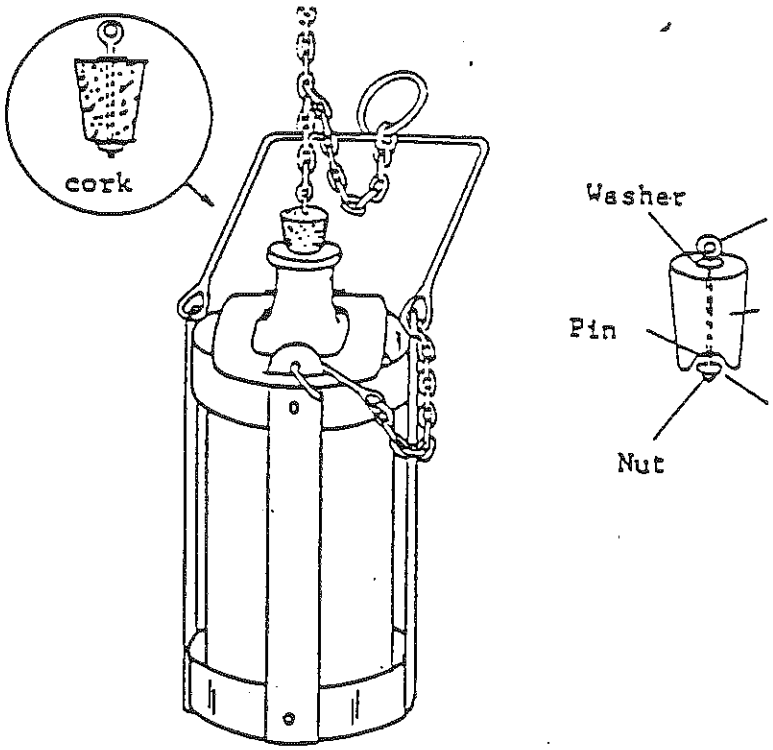


Figure 5
WEIGHTED BOTTLE SAMPLER

Table 1

SAMPLING EQUIPMENT FOR PARTICULAR WASTE TYPES

Sampling Point / Waste Type	Drum	Sacks and Bags	Open Bed Truck	Closed Bed Truck	Storage Tanks or Bins	Waste Piles	Ponds, Lagoons & Pits	Conveyor Belt	Pipe
Free Flowing Liquids and Slurries	Coliwasa	N/A	N/A	Coliwasa	Weighted Bottle	N/A	Dipper	N/A	Dipper
Sludges	Trier	N/A	Trier	Trier	Trier	N/A		N/A	N/A
Moist Powders or Granules	Trier	Trier	Trier	Trier	Trier	Trier	Trier	Shovel	
Dry Powders or Granules	Thief	Thief	Thief	Thief	Thief	Thief	Thief	Shovel	
Sand or Packed Powders and Granules	Auger	Auger	Auger	Auger				N/A	
Large Grained Solids	arge Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	Large Trier	

h. Description of sampling point and sampling methodology

i. Date and time of collection.

j. Collector's sample identification number(s).

k. Field observations.

l. Any field measurements made (e.g., pH, flammability, explositivity).

Sampling situations vary widely. No general rule can be given as to the extent of information that must be entered in the log book. A good rule, however, is to record sufficient information so that someone can reconstruct the sampling without reliance on the collector's memory.

5. To establish the documentation necessary to trace sample possession from the time of collection through delivery to the laboratory, a chain of custody record must be filled out and accompany every sample.

The record must contain the following minimum information:

a. Collector's sample number.

b. Signature of collector.

c. Date and time of collection.

d. Place and address of collection.

e. Waste type.

f. Signatures of persons involved in the chain of possession.

g. Inclusive dates of possession.

II. SAMPLING

1. Sampling the diverse types of RCRA regulated wastes requires a variety of samplers. While some of these samplers are commercially available, others will have to be fabricated by the user. Table I is a general guide to the types of waste that can be sampled by each of the samplers.

2. The various types of samplers used are pictured in Figures 1 - 5.

3. Commonly available plastic or glass containers may be used for collecting hazardous waste samples.

4. All DOT regulations covering material must be observed when shipping samples to a laboratory for analysis.

III. ANALYSIS

Any waste shall be considered hazardous if it exhibits any of the following characteristics; ignitability, corrosivity, reactivity, EP toxicity.

Compliance with Regulations on land disposal restrictions requires analysis of F001-F005 spent solvents for components listed in Table CCWE. F001-F005 waste streams have known components of these solvents.

III. ANALYSIS (continued)

Guidance on methods for waste sampling and analysis is provided in Test Methods for Evaluating Solid Wastes, 2nd Edition, EPA Document SW-846, 1982, as amended.

Ignitability

A solid waste exhibits the characteristic of ignitability of a representative sample if the waste has any of the following properties:

1. It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60°C (140°F), as determined by Pensky-Martens Closed Cup Tester, using the test method specified in the American Society of Testing Materials (ASTM) Standard D-93-79 or D-93-80, or a Setaflash Closed Cup Tester, using the test method specified in ASTM Standard D-3278-78.

2. It is not a liquid and is capable, used standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.

3. It is an ignitable compressed gas as defined in 49 CFR 173.300 and as determined by the test methods described in that regulation or equivalent test methods approved by the Board (Section 720.120).

4. It is an oxidizer as defined in 49 CFR 173.151.

Corrosivity

A solid waste exhibits the characteristic of corrosivity if a representative sample of the waste has either of the following properties:

1. It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5, as determined by a pH meter using the EPA test method. The EPA test method for pH is specified as Method 5.2 in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods".

2. It is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year at a test temperature of 55°C (130°F) as determined by the test method specified in NACE (National Association of Corrosion Engineers) Standard TM-01-69 as standardized in "Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods" or an equivalent test method.

EP Toxicity

A solid waste exhibits the characteristic of EP toxicity if, using the test methods described in Appendix II (see attached), the extract from a representative sample of the waste contains any of the contaminants listed in Table I at a concentration equal to or greater than the respective value given in that Table. Where the waste contains less than 0.5 percent filterable solids, the waste itself, after filtering, is considered to be the extract.

TABLE I - MAXIMUM CONCENTRATION OF CONTAMINANTS
FOR CHARACTERISTICS OF EP TOXICITY

EPA Hazardous Waste Number	Contaminant	Concentration (mg/l)
D004	Arsenic	5.0
D005	Barium	100.0
D006	Cadmium	1.0
D007	Chromium	5.0
D008	Lead	5.0
D009	Mercury	0.2
D010	Selenium	1.0
D011	Silver	5.0
D012	Endrin (1,2,3,4,10,10-hexachloro- 1,7-epoxy-1,4,4a,5,6,7,8,8a-octahydro-1,4-endo, endo-5, 8-dimethano naphthalene	0.02
D013	Lindane (1,2,3,4,5,6-hexachlorocyclohexane, gamma isomer)	0.4
D014	Methoxychlor (1,1,1-Trichloro-2,2-bis [p-methoxyphenyl] ethane)	10.0
D015	Toxaphene ($C_{10}H_{10}Cl_8$ Technical chlorinated camphene, 67-69 % chlorine)	0.5
D016	2,4-D (2,4-Dichlorophenoxyacetic acid)	10.0
D017	2,4,5-TP Silvex (2,4,5-Trichlorophenoxypropianic acid)	1.0

Reactivity

Reactive wastes include wastes which have any of the following properties: (10 readilyu undergo violent chemical change; (2) react violently or form potentially explosive mixtures with water; (3) generate toxic fumes when mixed with water or, in the case of cyanide or sulfide-bearing wastes, when exposed to mild acidic or basic conditions; (4) explode when subjected to a strong initiating force; (5) explote at normal temperatures and pressures; or (6) fit within the Department of Transportation's forbidden explosives, Class A explosives, or Class B explosives classifications.

Characateristic of Reactivity

A solid waste exhibits the characteristic of reactivity if a representative sample of the waste has any of the following properties:

1. It is normally unstable and readily undergoes violent change without detonating.

2. It reacts violently with water.

Characteristic of Reactivity (continued)

3. It forms potentially explosive mixtures with water.

4. When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.

5. It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5 can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment. While no sulfides are presently being used, there are some cyanides present in the plant and any wastes suspected of containing cyanide should be analyzed in accordance with SW-846 Method 9010. Special care must be taken to keep the pH of the sample above 12.0 using sodium hydroxide.

6. It is capable of detonation of explosive reaction if it is subjected to a strong initiating source or if heated under confinement.

7. It is readily capable of detonation of explosive decomposition or reaction at standard temperature and pressure.

8. It is a forbidden explosive as defined in 49 CFR 173.51, or a Class A explosive as defined in 49 CFR 173.53 or a Class B explosive as defined in 49 CFR 173.88.

Note: No sulfides are presently being used. Any reactive sulfide generated by process changes are to be analyzed in accordance with Method 9030 of SW-846. There are some cyanides present in the plant and any wastes suspected of containing cyanide should be analyzed in accordance with SW-846, Method 9010. Special care must be taken to keep the pH of the sample above 12.0 using sodium hydroxide.

Restricted Solvents for Land Disposal

Waste streams with F001-F005 characteristics are to be identified and analyzed for those components shown in Table CCWE. Future listings are identified in 40CFR Part 268.10, 268.11, 268.12, and 268.13.

TABLE CCWE -- CONSTITUENT CONCENTRATIONS WASTE EXTRACT

F001-F005 Spent solvents	Concentration (in mg/l)	
	Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1.2-Dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethylbenzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyndine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,1,2-Trichloro-1,2,2-Trifluorethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

F020-F023 and F026-F028 dioxin containing wastes	Concentration
HxCDD--All Hexachlorodibenzo-o-dioxins	< 1 ppb
HxCDF--All Hexachlorodibenzofurans	< 1 ppb
PeCDD--All Pentachlorodibenzo-o-dioxins	< 1 ppb
PeCDF--All Pentachlorodibenzotfurans	< 1 ppb
TCDD--All Tetrachlorodibenzo-o-dioxins	< 1 ppb
TCDF--All Tetrachlorodibenzofurans	<1 ppb
2,4,5-Trichlorophenol	< 0.05 ppm
2,4,6-Trichlorophenol	< 0.05 ppm
2,3,4,6-Tetrachlorophenol	< 0.05 ppm
Pentachlorophenol	< 0.01 ppm

IV. FREQUENCY AND RATIONALE

The following wastes are generated on site and shall be analyzed as indicated. The analyses shall be repeated when the materials used or the processes generating the wastes change sufficiently to alter the state of the wastes being generated. It may also be necessary to repeat analyses as requested by disposal sites.

1. Paint Waste - Corrosivity, ignitability and EP toxicity and solvent compounds.

   The paint is known to contain mixed flammable solvents, inorganic pigments and organic resins. Some of the organics may become corrosive if hydrolyzed. Solvents include xylene and toluene

2. Paint Stripper Waste - Corrosivity, EP toxicity, and solvent components.

   The paint stripper waste contains inorganic pigments, organic resins, and methylene chloride. Inorganic pigments of the stripped paint may be toxic.

3. Trichloroethylene Waste - Corrosivity, EP toxicity and solvent components.

   The halogenated solvents will form acids in the presence of water. The waste solvent is generated by vapor degreasing and can pick up water from the air humidity and possible metal chips from the metals degreased.

4. Waste Freon - Corrosivity, EP toxicity and solvent components.

   The halogenated solvent will form acids in the presence of water. The waste solvent is generated by vapor degreasing and can pick up water from the air humidity. It is possible to extract toxic metals with the acidic condition. Solvents present would be freon.

5. Agitene-Waste Petroleum Naptha - Ignitability, corrosivity, EP toxicity and solvent components.

   The solvent is a combustible liquid and its flash point must be verified. Tool steels are cleaned and toxic metal contamination is a possibility. Occasionally caustic is used to clean plastic molds which could result in a corrosive condition. The solvent is a petroleum solvent.

6. Agitene and Oil - Waste Petroleum Naptha Oil - Ignitability, corrosivity, EP toxicity and solvent components.

   The waste is the same as waste petroleum naptha but would also include non-hazardous oils.

7. Methylene Chloride & Resin - Corrosivity, EP toxicity and solvents.

   Methylene chloride is used to flush potting resin from equipment. The organic material may become corrosive when hydrolyzed and the inorganic pigments may include toxic substances.

8. Trichloroethane and Oil - Corrosivity, EP toxicity and solvent.

   Small quantities of silicone oil is flushed from devices with 1,1,1 trichloroethan before shipment. Traces of toxic metals could be flushed from the system and water pick up could cause some corrosivity. (The stream has not yet generated enough waste to analyze.)

9. Waste Water Treatment Sludge - Corrosivity and EP toxicity.

   The sludge is generated by the pretreatment of electroplating waste water. The water treated contains toxic metals and acids. The sludge is considered non-reactive but may contain low levels of cyanide after the treatment process. Samples are analyzed to verify the level of cyanide present.

D. H. Samdahl
2/15/88
2549D8/gh

P 250 801 213

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to DON SAMDAHL	
Street and No. 1601 G. E. Road	
P.O., State and ZIP Code Bloomington, IL 61702	
Postage	$ .73
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.70
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 2.18
Postmark or Date	

* U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

2. THOMAS WEBER, 2305 DEARBORN, CHAMPAIGN, IL 61821

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:
DON SAMDAHL
GENERAL ELECTRIC Company
1601 G. E. ROAD
BLOOMINGTON, IL 61702

4. Article Number
P 250 801 213

Type of Service:
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature — Addressee
X

6. Signature — Agent
X Tim Jeffers

7. Date of Delivery
1-25-88

8. Addressee's Address *(ONLY if requested and fee paid)*

JAN 25 1988 BLOOMINGTON, IL

PS Form 3811, Feb. 1986

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.
- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

U.S.MAIL

PENALTY FOR PRIVATE USE, $300

RETURN TO

Print Sender's name, address, and ZIP Code in the space below.

ZETTA THOMAS (5HE-12)
U.S. ENVIRONMENTAL PROTECTION Agency
230. S. Dearborn, Chicago, IL 60604

5HE-12

21 JAN 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Samdahl
General Electric Company
1601 G. E. Road
Bloomington, Illinois 61702

Re: Notice of Violation
General Electric Company
ILD 005 453 691

Dear Mr. Samdahl:

On August 28, 1987, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the land disposal restriction of certain spent solvents. The land disposal restrictions became effective on November 8, 1986, (reference 51 Federal Register 40636: 40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270).

With respect to the land disposal requirements section of the inspection, your facility was found to be in violation of certain land disposal requirements as noted below:

1. Failure to include the applicable treatment standards in the notification for each shipment of F-solvent waste to an off-site treatment facility, as required by Section 268.7(a)(1); and

2. Failure to revise the facility waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected

and indicating what measures have been initiated to assure future compliance. Failure to correct the violation(s) may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

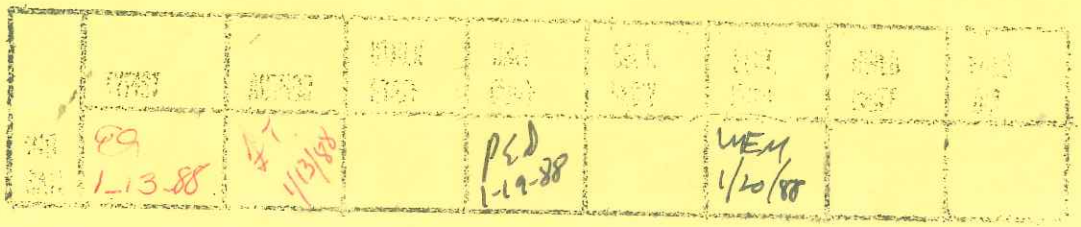
ORIGINAL SIGNED BY
WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Section

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

bcc: Paul Dimock



ILD005453691
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: General Electric Co.

(B) Street: Veterans Parkway and GE Road

(C) City: Bloomington (D) State: Ill. (E) Zip Code: 61701

(F) Phone: 309/662-4311 (G) County: McLean

(H) Operator: General Electric Co.

(I) Street: Veterans Parkway and GE Road

(J) City: Bloomington (K) State: Ill. (L) Zip Code: 61701

(M) Phone: 309/662-4311 (N) County: McLean

(O) Owner: General Electric Co.

(P) Street: Veterans Parkway and GE Road

(Q) City: Bloomington (R) State: Ill. (S) Zip Code: 61701

(T) Phone: 309/662-4311 (U) County: McLean

(V) Type of Ownership: ___ Federal ___ Municipal ✓ Private ___ State ___ County

(W) Date of Inspection: 3-27-81 (Q) Time of Inspection (From) 11:00 A.M. (To) 1:00 P.M.

(X) Weather Conditions: Sunny, clear high in the 50's

(Y) Person(s) Interviewed	Title	Telephone
Tom Atzen	Environmental Specialist	309/662-4311

(Z) Inspection Participants	Title	Telephone
Sherry Otto	EPSI	217-782-6760

II. Description of Site Activity

(A) ✓ Generator (Form 2)

(B) ____ Transporter (Form 3)

(C) ✓ Chemical, Physical and Biological Treatment (Form 4)

(D) ✓ Storage (Form 5)

(E) ____ Landfill (Form 6)

(F) ____ Incineration (Form 7)

(G) ____ Land Treatment (Form 4)

(H) ____ Thermal Treatment (Form 7)

(I) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	✓			

II GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		✓		no waste is received from a foreign source
2. Transfer of Ownership?		✓		
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓			
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓			
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓			
(C) Security - Do security measures include:				
1. 24-Hour Surveillance?	✓			
2. Artificial or Natural Barrier Around Facility?	✓			24 hr. guard and gate
3. Controlled Entry?	✓			
4. Danger Sign(s) at Entrance?	✓			
(D) Do Owner or Operator Inspections Include:				
1. Records of Malfunctions?			✓	none
2. Records of Operator Error?			✓	none
3. Records of Discharges?			✓	none
4. Inspection Schedule?	✓			
5. Safety, Emergency Equipment?	✓			
5. Security Devices?	✓			
7. Operating and Structural Devices?	✓			
8. Inspection Log?		✓		will start and inspec. log

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include:				
1. Job Titles?	✓			
2. Description of Training?	✓			
3. Records of Training?	✓			
Is Personnel Training Completed within the Required Time Frame?	✓			
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?				
1. Special Handling?	✓			
2. No Smoking Signs?	✓			
3. Separation and Confinement?	✓			

IV. PREPAREDNESS AND PREVENTION

	Yes	No	Not Inspected	See Remark Number
(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, Explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) Does the Facility have the Following Equipment:				
1. Alarm System?	✓			fire alarm
2. Telephone or 2-Way Radios?	✓			telephones throughout plan
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			dri-rite is used for spill control

Indicate the volume of water and/or foam available for fire control:

Units: Fire hydrant, dry foam 150# portable dry chemical units for class B fires, 1½" fire hoses

Small hand held dry chemical and CO_2 extinguishers.

	Yes	No	Not Inspected	See Remark Number
(C) Testing and Maintenance of Emergency Equipment:				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	✓			monthly
2. Is Emergency Equipment Maintained in Operable Conditions?	✓			
(D) Has Owner or Operator Provided Immediate Access to Internal Alarms (if needed)?	✓			
(E) Is there Adequate Aisle Space for Unobstructed Movement?	✓			
(F) Are Arrangements with Local Authorities Included in the Operating Record?	✓			

VI. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(A) Does the Contingency Plan Contain the Following Information:				
1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)	✓			emergency plan for the hazardous material plus a map showing the locations of the
2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §264.37?	✓			hazardous material and a map showing the location of all the emergency equip

	Yes	No	Not Inspected	See Remark Number
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	✓			
4. A list of all emergency equipment at the facility which includesthe location and physical description of each item on the list and a brief outline of its capabilities?	✓			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)	✓			
(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?	✓			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓			
2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?	✓			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
(D) Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?			✓ No emergency situation has occured	

VII. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	✓			
2. Are records of past shipments retained for 3 years?	✓			
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	✓			
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	✓			
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	✓			

VIII. CLOSURE AND POST CLOSURE

	Yes	No	Not Inspected	See Remark Number
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?		✓	✓	
2. Has this plan been submitted to the Regional Administrator?		✓	✓	
3. Has Closure begun?		✓	✓	
4. Is closure cost estimate available by May 19, 1981?		✓	✓	
(B) Post Closure Care and Use of Property - Has the Owner/Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?		✓	✓	

ILD005453691
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection

I. General Information:

(A) Installation Name: General Electric Co.

(B) Street: Veterans Parkway and G.E. Road

(C) City: Bloomington (D) State: Illinois (E) Zip Code: 61701

(F) Phone: (309) 662-4311 (G) County: McLean

(H) Operator: General Electric Co

(I) Street: Veterans Parkway and G.E. Road

(J) City: Bloomington (K) State: Illinois (L) Zip Code: 61701

(M) Phone: (309) 662-4311 (N) County: McLean

(O) Owner: General Electric Co.

(P) Street: Veterans Parkway and G.E. Road

(Q) City: Bloomington (R) State: Illinois (S) Zip Code: 61701

(T) Phone: (309) 662-4311 (U) County: McLean

(V) Type of Ownership: ____ Federal ____ Municipal ✓ Private ____ State ____ County

(W) Date of Inspection: 3-22-81 Time of Inspection (From) 11:00 A.M. (To) 1:00 P.M.

(X) Weather Conditions: Sunny, clear, high in the 50's.

(Y) Person(s) Interviewed	Title	Telephone
Tom Atzen	Environmental Spec.	309/662-4311

(Z) Inspection Participants	Title	Telephone
Sherry Otto	E.P.S.I	217/782-6760

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) ____ Transporter (Form 3)

(B) ✓ Chemical, Physical and Biological Treatment (Form 4)

(C) ✓ Storage (Form 5)

(D) ____ Landfill (Form 6)

(E) ____ Incineration (Form 7)

(F) ____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available?	✓			
(B) Does the Manifest contain the following information:				
1. Manifest document number?	✓			
2. Name, mailing address, telephone number, and EPA ID Number of Generator?	✓			
3. Name and EPA ID Number of Transporter(s)?	✓			
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?	✓			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓			
6. The total quantity of waste(s) and the type and number of containers loaded?	✓			
7. Required Certification?	✓			
8. Required Signatures?	✓			
(C) Does the Owner or Operator Submit Exception Reports when Needed?			✓	None has been needed

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is Generator Packaging waste in accordance with DOT Regulations?	✓			
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?	✓			
(C) If required, are placards available to transporter?	✓			

	Yes	No	Not Inspected	See Remark Number
D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	✓			
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?		✓		See form 5
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	✓			
4. Are wastes stored in tanks managed according to the following:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?				
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
c. Do continuous feed systems have a waste-feed cutoff?				
d. Are required daily and weekly inspections done?				
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requi em nts?				
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)				

	Yes	No	Not Inspected	See Remark Number
5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards?				
A. Do Personnel training records include:				
1. Job Titles?	✓			
2. Description of Training?	✓			
3. Records of Training?	✓			
Is Personnel Training Completed within the Requried Time Frame?	✓			
B. Prepardness and Prevention				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
2. Does the Facility have the following equipment?				
a. Alarm system?	✓			fire alarm
b. Telephone or 2-Way Radios?	✓			telephones throughout plant
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			dri-rite is use for spill control

Indicate the volume of water and/or foam available for fire control

Units: fire hydrant, dry foam, 150# portable drychemical units for class B fires 1½" fire hoses small handheld extinguishers dry chemical + CO_2

3. Testing and Maintenance of Emergency Equipment:				
a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment	✓			monthly
b. Is emergency equipment Maintained in Operable Condition?	✓			

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?	✓			
5. Is there adequate Aisle Space for unobstructed Movement?	✓			
6. Are arrangements with local authorities included in the operating record?	✓			

(C) Contingency Plan and Emergency Procedure

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)	✓			
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?	✓			
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.	✓			
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.	✓			

	Yes	No	Not Inspected	See Remark Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations?	✓			
3. Emergency Coordinator				
a. Is the Facility Emergency Coordinator Identified?	✓			
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	✓			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓			
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?			✓	No emergency situation has occured

V. RECORDKEEPING

(A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?	✓			

VI. INTERNATIONAL SHIPMENTS

(A) Has the Installation Imported or Exported Hazardous Waste?		✓		
(If A was answered Yes, then complete one or both of the following)				
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				

	Yes	No	Not Inspected	See Remark Number
c. Met the Manifest requirements?				

2. Importing Hazardous Waste, has the generator:

	Yes	No	Not Inspected	See Remark Number
a. Met the manifest requirements?				

VII. PREPARER INFORMATION

Name: Sherry Otto

Title: E.P.S. I

Phone Number: 217/782-6760

REMARKS:

EPA IDENTIFICATION NUMBER
ILD005453691

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 4 - Chemical, Physical and Biological Treatment/Land Treatment

I. General Information

(A) Facility Name: General Electric Co

(B) Street: Veterans Parkway and G.E. Road

(C) City: Bloomington (D) State: Ill. (E) Zip Code 61701

(F) Phone: 309/662-4311 (G) County: McLean

II. Chemical, Physical and Biological Treatment (Subpart Q)

	Yes	No	Not Inspected	See Remark Number
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?		✓		neutralize acids $CaOH$
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	✓			
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	✓			
4. Are inspection procedures followed according to 265.403?	✓			
5. Are the special requirements fulfilled for ignitable or reactive wastes?	✓		100	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)		✓		no incompatible waste

neutralize HCl with $CaOH$

HNO_3 with $CaOH$

H_3PO_4 with $CaOH$

ILD005453691
EPA IDENTIFICATION NUMBER

~~RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS~~
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

I. General Information

(A) Facility Name: General Electric Co

(B) Street: ~~General~~ Veterans Parkway and G.E. Road

(C) City: Bloomington (D) State: Ill (E) ZIP Code 61701

(F) Date of Inspection: 3-27-81

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I)

	YES	NO	NOT INSPECTED	REMARK #
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	✓			300ft from property line
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?	✓			

B. Facilities which store hazardous waste in tanks (Subpart J)

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				

Continued on next page

ENVIRONMENTAL PROTECTION AGENCY   STATE OF ILLINOIS

I L D 0 0 5 4 5 3 6 7 1

L P C F C 0 5 5 (1)–(8)   C (9)

OBSERVATION REPORT - SITE INVENTORY NO. 1 1 3 0 2 0 1 6 (11)–(18)

McLean CO. - L.P.C.   Region # C   Date 0 3 / 2 7 / 8 1 (20)–(25)

Bloomington (Location) / General Electric Co. (Responsible Party)   Letter Sent (Yes or No) No (26)

Samples Taken: Yes ( ) No (✓)   Time: From 1 1 : 0 0 A m   Weather Sunny 50's

Ground Water( ) Surface( ) Other( )   To 0 1 : 0 0 P m

Photos Taken: Yes ( ) No (✓)   Interviewed Tom Atzen   Inspector S (27) M O (29)

Previous Inspection None   Previous Correspondence None   Site Open: Yes(✓) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	(✓)	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other Industry	(✓)	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)	(30)			Board Order	( )
						Illegal (5)	( ) (31) NA

IMPROVED

SAME

DETERIORATED

LPC 4 1/79 5,000

I S or D ____ (62)

GENERAL REMARKS: Talked with Mr. Tom Atzen who is a chemist and an environmental specialist at General Electric. In the chemical treatment room, CaOH is used to neutralize HCl, HNO_3, and H_3PO_4. This room is monitored constantly for any malfunction. The neutralized acid then goes into the city sewage system. The storage area had approx. twenty five (25) 55 gal drums, single stacked, with adequate aisle space between drums.

INTERVIEW:

DIAGRAM:

5EWHME

31 AUG 1981

Tom Atzen, Environmental Specialist
General Electric Company
Veterans Parkway and G.E. Road
Bloomington, Illinois 61701

Re: General Electric Company
Bloomington, Illinois ILD005453691

Dear Mr. Atzen:

Enclosed please find a copy of the report of the inspection dated March 27, 1981, conducted at the above facility by a representative of the Illinois Environmental Protection Agency (IEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended by the Quiet Communities Act of 1978. In a telephone conversation on August 24, 1981, you informed Phil Kaplan of my staff that inspections were now being recorded in an inspection log. You also stated that a closure plan was on file at your facility. This additional information has enabled us to make the determination that your facility is in compliance with RCRA.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report, please contact Phil Kaplan at (312) 353-2114.

Very truly yours,

Arnold E. Leder, Chief
Compliance Section
Water & Hazardous Materials
Enforcement Branch

Enclosure

cc: Michael Hayes, Acting Manager
Land/Noise Pollution Control Division
Illinois Environmental Protection Agency

bcc: Constantelos/Klepitsch
Stone
Baumgartner/Lewis
Kaplan
Sherry Otto - IEPA, Springfield

PKaplan/ng 8-25-81 6-6715

Gingher M.Y. 8-25-81
Kaplan PK 8-26-81
Baumgartner PK for Baumgartner
Donaldson td
Leder _____